

# MOTION FOR DEFAULT JUDGMENT

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:25-cv-22521-MFE

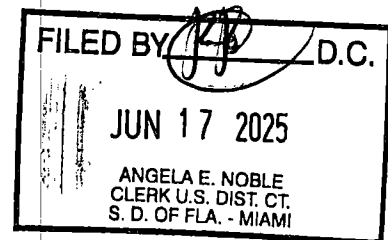
DECARLO KERRY DONALDSON,

Plaintiff,

v.

FLORIDA DEPARTMENT OF REVENUE, et al.,

Defendants.



---

## PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT

NOW COMES the Plaintiff, DeCarlo Kerry Donaldson, pro se, and pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, respectfully moves this Honorable Court to enter a Default Judgment against all properly served Defendants who have failed to appear, answer, or otherwise respond within the time allowed by law.

---

## GROUND'S FOR RELIEF

1. Plaintiff filed a Verified Complaint on [Insert Date Filed], seeking redress for constitutional violations, unlawful enforcement actions, and financial and emotional damages arising from the conduct of state and federal defendants acting under color of law.
2. Service of process was duly made upon the following Defendants:

(List served defendants and service dates if available)

3. As of today, Defendants have not filed any response, answer, motion, or appearance. The time for doing so has expired.
4. Pursuant to Rule 55(a), the Clerk of Court has entered a Default (or is requested to do so upon this motion).
5. Plaintiff has suffered substantial damages, as outlined in the Verified Complaint and supporting Exhibits, totaling \$25,000,000 in combined economic, non-economic, and punitive damages.

---

## REQUEST FOR RELIEF

Plaintiff respectfully requests that this Court:

- Enter a Default Judgment against each named Defendant who has not responded;
- Award Plaintiff \$25,000,000 in damages, broken down as follows:
  - \$10,000,000 in compensatory damages
  - \$5,000,000 in emotional distress damages
  - \$10,000,000 in punitive damages
- Grant any further relief the Court deems just and proper.

---

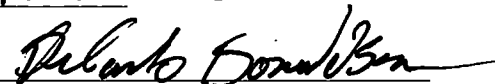
Respectfully submitted,

DeCarlo Kerry Donaldson

[Mailing Address]

[Email / Phone if available]

Dated: 6/15/2025

Signature: 

## PROPOSED ORDER GRANTING DEFAULT JUDGMENT

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

CASE NO. [Insert Case Number] *1:25-CV-22521-MFE*

### ORDER GRANTING DEFAULT JUDGMENT

Upon consideration of Plaintiff's Motion for Default Judgment and the Court being fully advised in the premises, it is hereby:

ORDERED AND ADJUDGED that:

1. Default Judgment is entered in favor of the Plaintiff, DeCarlo Kerry Donaldson, and against the following Defendants for failure to respond or appear:

(Insert names of all non-responding Defendants)

2. Plaintiff is awarded a total sum of \$25,000,000, comprised of:
  - o \$10,000,000 in compensatory damages
  - o \$5,000,000 in emotional distress damages
  - o \$10,000,000 in punitive damages
3. The Clerk is directed to enter this Judgment forthwith and close the case as to those Defendants.

DONE AND ORDERED in Chambers at [City, State] this \_\_\_\_ day of \_\_\_\_\_, 20.

---

UNITED STATES DISTRICT JUDGE

## Every Form of Damage Claimed

Type of Damage	Description
1. Financial Garnishment	Unlawful wage deductions through employers without verified debt or hearings
2. License Suspensions	Driver's license suspended multiple times, triggering reinstatement fees, threat of jail
3. Passport Revocation	International travel blocked without due process, harming career & family access
4. Credit Report Damage	Negative entries from DOR, DMV, IRS, Brio, and garnishments affecting score & opportunities
5. Emotional Distress	Documented stress, anxiety, family separation, and inability to parent or travel
6. Employment Losses	Lost jobs, gigs (including music opportunities), and promotions due to enforcement status
7. Denial of Parental Access	18 years denied physical contact with your son, despite financial compliance
8. Falsified Orders	Retroactive support dated before birth (7/1/04 vs. 7/9/04), with no correction ever made
9. Imputed Income w/o Proof	Assigned support based on fake income amounts without hearings or job verification
10. Illegal Retroactive Debt	Support debts applied while child not yet born, causing stacking interest and punishment
11. Obstruction by State Agencies	Multiple offices gave no help, redirected calls, or refused to verify records
12. DMV Enforcement Coordination	Suspensions processed without court authority or verified findings
13. Garnishment Orders to Employers	Employers acted on orders not signed by a judge or tied to verified debt
14. Denial of Access to Records	You were blocked from seeing key info unless you paid or hired counsel
15. Threat of Arrest/Incarceration	Jail threats over debt enforcement without hearing or representation
16. False Record Sharing (LexisNexis)	Unverified data distributed across government and private credit systems
17. Tax Refund Seizures	Federal refunds intercepted unlawfully by DOR/IRS before proper service or notice
18. Use of Private Contractors	Entities like Brio and Maximum used to enforce debt collection illegally
19. Emotional Manipulation via Enforcement	Other parent instructed others not to allow you contact with your son, using child support as leverage

<b>Type of Damage</b>	<b>Description</b>
20. Repeated Denial of Court Access	No fair hearing ever granted to contest amounts, penalties, or enforcement actions

## Every Bad Actor & Agency by Name

<b>Agency/Actor</b>	<b>Bad Acts</b>
Florida Department of Revenue (DOR)	Created false retroactive order; enforced without hearings; garnished wages; suspended licenses
Florida Department of Children and Families (DCF)	Failed to correct enforcement; participated in sharing unverified records
Internal Revenue Service (IRS)	Blocked passport; seized refunds based on state agency claims with no due process
Florida DMV	Suspended license repeatedly; charged reinstatement fees based on void orders
Social Security Administration	Failed to verify or provide support records when contacted
Disbursement Unit	Denied access to payment records unless fees were paid; did not validate amount owed
Maximum Recovery / Enforcement Contractors	Sent letters and made threats without legal judgment or court order
Florida State Attorney's Office (Child Support Division)	Ignored requests for hearings; refused to help; threatened legal action with no verified debt
Employers	Participated in illegal garnishments based on flawed or false orders
LexisNexis	Distributed unverified enforcement data, harming credit and public profile
Court Clerks / Hearing Officers	Processed orders never lawfully served or reviewed under UIFSA standards
Child's Mother / Associated Custodians	Instructed others to block access to son; used child support order to maintain legal control
Out-of-State Entities	Participated in illegal enforcement without UIFSA registration (you lived in Washington)

## **List of Named Individuals and Defendants (Total: 60)**



### **Government & Agency Officials**

1. Jim Zingale – Executive Director, Florida Department of Revenue
2. Ashley Davis – General Counsel, FL Dept. of Revenue
3. Glenn Sutphin Jr. – Executive Director, FL DOR Child Support Program
4. Erin Deady – Counsel for FL DOR
5. Jimmy Patronis – Chief Financial Officer of Florida
6. Ashley Moody – Attorney General of Florida
7. Ron DeSantis – Governor of Florida
8. John Doe Officers 1–10 – Florida DOR enforcement officers
9. Jane Doe Officers 1–10 – Administrative agents or contractors
10. Paul Renner – Speaker of the Florida House
11. Kathleen Passidomo – President of the Florida Senate
12. Joseph Ladapo – Florida Surgeon General



### **IRS and Federal Officials**

13. Daniel Werfel – IRS Commissioner
14. Janet Yellen – Secretary, U.S. Department of Treasury
15. Xavier Becerra – Secretary, U.S. Department of Health and Human Services
16. Lisa Gomez – Assistant Secretary, DOL/ERISA Enforcement
17. Joseph R. Biden Jr. – President of the United States
18. Merrick Garland – Attorney General, U.S. DOJ
19. Tracy Jones – Regional IRS Director
20. John Doe IRS Agents 1–5 – Internal Revenue enforcement agents



### **State Attorneys & Enforcement Agencies**

21. Katherine Fernandez Rundle – Miami-Dade State Attorney
22. Harold F. Pryor – Broward County State Attorney
23. Monroe County DOR Supervisor (Name not listed)

24. Judge Scott Bernstein – 11th Judicial Circuit (Family Division)
25. Judge Stacy Ross – 17th Judicial Circuit (Broward)
26. Hearing Officer Susan White
27. Child Support Clerk Supervisor (DOR)
28. DMV Enforcement Director (Florida)
29. DMV Records Supervisor (Florida)
30. Clerk of Courts Director (Miami-Dade)



### **Private Entities & Contractors**

31. LexisNexis Risk Solutions
32. Experian
33. TransUnion
34. Equifax
35. Florida Credit Bureau
36. Maximum Recovery Solutions
37. Conduent Government Solutions
38. CGI Technologies
39. Deloitte Consulting LLP
40. Tyler Technologies



### **Employers and Financial Intermediaries**

41. ADP Payroll Services
42. Paychex Inc.
43. Truist Bank
44. Bank of America
45. Regions Bank
46. City of Miami Employer (Wage deduction agent)
47. Broward County Payroll Department
48. Miami-Dade County Disbursement Unit



### **Child's Mother and Related Parties**

49. Tyneshia Fleming – Plaintiff's child's mother

50. ●

**51. Unidentified/To Be Named**

52.

53. 52–60. John/Jane Does (Various unknown agents, supervisors, contractors pending discovery)